

**Comments on texts resulting from the Terrestrial Animal Health Code
Commission Report – September 2005 Meeting
Submitted by the United States of America**

Appendix 3.7.5.

Guidelines for the Slaughter of Animals for Human Consumption

Article 3.7.5.1.

General Principles

Current proposed text:

Item 1: Object – These guidelines apply to the slaughter in slaughterhouses of the following domestic animals: cattle, buffalo, sheep, goats, deer, horses, pigs, ratites and poultry.

Suggested proposed text:

Item 1: Object – These guidelines apply to the slaughter in slaughterhouses of the following: cattle, buffalo, sheep, goats, deer, horses, pigs, ratites, rabbits, and poultry.

Comment/Rationale:

In the proposed text there is an absence of a reference to rabbits, which are commonly slaughtered in slaughterhouses for human consumption. We suggest that rabbits be included in the proposed text unless the intent is to include them under the category “other animals”.

Current proposed text:

Item 2: Personnel – Competence may be gained through formal training and/or practical experience. This competence should be demonstrated through a current certificate from an independent body accredited by the Competent Authority.

Suggested proposed text:

Item 2: Personnel – Competence may be gained through formal training and/or practical experience. ~~This competence should be demonstrated through a current certificate from an independent body accredited by the Competent Authority.~~

Comment/Rationale:

There is no scientific basis to require the demonstration of competence through a certification program; therefore the specific text should be deleted. Competency of personnel should be provided through adequate training and experience to adequately perform their responsibilities that include the welfare of the animals. Additionally, the proposed guidelines do not provide criteria for certification requirements and how often personnel must be certified.

Article 3.7.5.2

Moving and handling animals

Current proposed text:

Item 2: Provisions relevant to animals in containers, Part (c) –

Animals which have been transported in containers should be slaughtered as soon as possible; mammals and ratites which are not taken directly upon arrival to the place of slaughter should have drinking water available to them from appropriate facilities at all times. Delivery of poultry for slaughter should be scheduled such that they are not deprived of water at the premises for longer than 12 hours. Animals which have not been slaughtered within 12 hours of their arrival should be fed, and should subsequently be given moderate amounts of food at appropriate intervals.

Suggested proposed text:

Item 2: Provisions relevant to animals in containers, Part (c) –

Animals which have been transported in containers should be slaughtered as soon as possible; mammals and ratites which are not taken directly upon arrival to the place of slaughter should have drinking water available to them from appropriate facilities at all times. Delivery of poultry for slaughter should be scheduled such that they are not deprived of water at the premises for longer than 24 ~~12~~ hours. Animals which have not been slaughtered within 24 ~~12~~ hours of their arrival should be fed, and should subsequently be given moderate amounts of food at appropriate intervals.

Comment/Rationale:

This guideline calls for feeding animals if they are being held more than 12 hours. Under the Humane Slaughter Act, administered by USDA's Food Safety & Inspection Service (FSIS), livestock must be fed if they are held more than 24 hours. The proposed guideline is a significant change in the amount of time an animal may held before feed and water is provided. More frequent feeding makes managing stomach contents during the slaughter process – and the associated food safety issues it can present – a serious challenge. It will additionally cause significant carcass contamination and environmental impact.

Lairage design and construction

Current proposed text:

Item 2: Design of lairages, Part (i) – Unloading ramps should be designed and constructed so as to permit animals to be loaded from vehicles on the level or at the minimum gradient achievable.

Suggested proposed text:

Item 2: Design of lairages, Part (i) – Unloading ramps should be designed and constructed so as to permit animals to be loaded from vehicles on the same level or at the minimum gradient achievable.

Comment/Rationale:

The suggested change in the text clarifies the intent of the proposed guideline for the reader.

Current proposed text:

Item 3: Construction of lairages, Part (d) – Lairages should be adequately ventilated to ensure that waste gases, e.g. ammonia do not build up and that draughts at animal height are minimised. Ventilation should be able to cope with the range of expected climatic conditions and the number of animals the lairage will be expected to hold.

Suggested proposed text:

Item 3: Construction of lairages, Part (d) – Lairages should be adequately ventilated to ensure that waste gases, e.g. ammonia do not build up and that draughts at animal height are minimized to prevent undue stress on the animals and retard their movement. The ventilation and/or air handling system(s) should be appropriately designed to cope with the range of expected climatic conditions and the number of animals the lairage will be expected to hold.

Comment/Rationale:

The text should be added to emphasize that ventilation systems should be designed in a way that does not stress the animals. Poorly designed ventilation systems that blow in animals' faces can be stressful and hinder their movement.

Article 3.7.5.4.

Care of animals in lairages

Current proposed text:

Item 6: If animals are not to be slaughtered as soon as possible, suitable feed should be available to the animals on arrival and at intervals appropriate to the species. Unweaned animals should be slaughtered as soon as possible.

Suggested proposed text:

Item 6: If animals are not to be slaughtered as soon as possible, suitable feed should be available to the animals within 24 hours ~~on~~ of arrival and at intervals appropriate to the species. Unweaned animals should be slaughtered as soon as possible.

Comment/Rationale:

This content of this guideline should be consistent with the same requirement contained in Article 3.7.5.2 Item 2: Provisions relevant to animals in containers, Part (c).

Current proposed text:

Item 11: Second sentence – Under normal circumstances, animals which are expected to give birth during a journey should not be transported.

Suggested proposed text:

Item 11: Second sentence – Under normal circumstances, animals that ~~which~~ are expected to give birth during a journey should not be transported.

Comment/Rationale:

The suggested change in the text clarifies the intent of the proposed guideline for the reader.

Article 3.7.5.7.

Stunning methods

Current proposed text:

Item 2: Mechanical Stunning – Hornless sheep and goats: The optimum position for hornless sheep and goats is on the midline.

Suggest proposed text:

Item 2: Mechanical Stunning – Sheep: The optimum position for hornless sheep and goats is on the midline just above the eye level, and directing the shot down the line of the spinal cord.

Comment/Rationale:

We recommend that the text under figure of a sheep not be deleted from guideline. The text proposed for deletion clarifies the optimum position that should be used to direct mechanical stunning for humane killing in hornless sheep and goats.